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Attorney for Plaintiff State Farm Mutual Automobile Insurance Company

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

STATE FARM MUTUAL AUTOMOBILE)
INSURANCE COMPANY,)
)
Plaintiff,)
)
vs.)
)
UNITED STATES OF AMERICA,)
)
Defendant,)
_____)

COMPLAINT

Plaintiff, State Farm Mutual Automobile Insurance Company, by and through its undersigned attorney, alleges the following for its Complaint against the Defendant, United States of America, through the Department of the Air Force (hereinafter "United States").

NATURE OF ACTION

1. This action for damages arises out of an automobile accident at or near Anchorage, Alaska.
2. Plaintiff State Farm Mutual Automobile Insurance Company is an insurance company duly conducting business under the laws of the State of Alaska, and is fully qualified to maintain this action.
3. Defendant United States, is a governmental agency doing business within the State of Alaska.

JURISDICTION AND VENUE

4. This court has jurisdiction over this action under the Federal Tort Claims Act, 28.U.S.C. §2671, ET. SEQ.

FIRST CLAIM FOR RELIEF

(JOSEPH VALDEZ – NEGLIGENCE)

5. On or about March 16th, 2015, at or near Anchorage, Alaska, Joseph Valdez, an employee of the Defendant, drove a vehicle in a careless and negligent manner and as an actual and proximate result of said carelessness and negligence, collided with a vehicle operated by State Farm's insured, Mendi Miftari.

6. Mendi Miftari filed a claim with her insurance company, Plaintiff State farm, in order to recover damages sustained in the accident.

7. As a result of the collision, property damages in excess of \$4,013.17 were incurred, the exact sum to be proven at a later date.

8. Plaintiff made payments to cover damages to date set forth above; therefore entitling the Plaintiff, by contract and otherwise, to bring and maintain this present action.

SECOND CLAIM FOR RELIEF

(UNITED STATES– RESPONDEAT SUPERIOR)

9. At the time of the collision, Joseph Valdez was operating the vehicle within the scope and duty of his employment; Defendant United States is vicariously liable for its employee's negligence.

REQUEST FOR RELIEF

State Farm requests that judgment be entered in its favor and against Defendant, as follows:

- A. For an award of actual damages in amount to be proven at trial, together with interest;
- B. For an award of actual costs and attorney's fees;
- C. For such other and further relief is appropriate.

DATED this 14 day of JANUARY, 2015, at Anchorage, Alaska.


/s/ Ralph Ertz

Ralph Ertz, Attorney for Plaintiff
Alaska Bar No. 8911062